

Exhibit S

CIPRIANI & WERNER

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February 26, 2021

Via E-Mail To:

Marlene Goldenberg
Goldenberg Law, PLLC
800 LaSalle Ave., Suite 2150
Minneapolis, MN 55402
mjgoldenberg@goldenberglaw.com

**RE: *In re Valsartan Products Liability Litigation*, U.S. District Court
District of New Jersey, Camden Division, No. 1:19-md-02875**

Dear Mrs. Goldenberg:

As discussed, and per the agreement reached between the Plaintiffs and Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC in the above litigation, I write to provide the number of hits per custodian based on the Court approved search terms per the Order dated December 23, 2019 (Exhibit H thereto) [Dkt. 328] and modified by the Parties' Stipulated Order dated June 25, 2020 [Dkt. 497], and the Court approved list of custodians for Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC (see Dkt. 328 at Exhibit F). The hits per custodian are as follows:

Custodian	Hits
Johns, Blessy	220,202
Jackowski, Jeff	134,679
Gorijavolu, Prasad	64,130
Kota, Venkata	58,922
Martinez, Sandra	32,780
Burns, Daniel	20,367
Lucas, Steve	18,564
Gupta, Jasleen	14,830
Chada, Krishna Reddy	12,937
Doshi, Bhadresh	11,841

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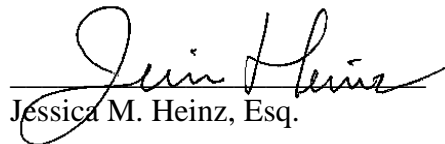
Shirshikar, Milind	10,822
Bheminemi, Sudhir	9,622
Ale, Srinivasulu	9,290
Patel, Arpit	7,224
Palew, Dave	3,678

In making this production, Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC expressly reserve all objections to relevance, discoverability and admissibility, and reserve all defenses, whether jurisdictional or otherwise. This production shall not be construed as an adoptive admission. Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC reserve their right to amend, supplement and revise their discovery production as investigation continues in this litigation.

If you have any questions, please do not hesitate to contact me. Thank you.

Very truly yours,

CIPRIANI & WERNER, P.C.



Jessica M. Heinz, Esq.

Cc: Ruben Honik
Andrew Obergfell
Ashleigh Raso
Daniel Nigh
Ben Stellpflug